

Tab 4

Technical Standards



(b) Technical standards.

(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

Wyoming Relay Service (WYRS) is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by WYRS can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. WYRS furnishes all necessary telecommunications equipment and software to be capable of communicating with all voice, Baudot and ASCII calls at the correct Baud rate. The workstations and switching mechanisms used by WYRS are flexible enough to process other formats as they become available to relay users.

The Wyoming Relay Service provides Turbo Code, a proprietary alternate protocol developed by Ultratec which allows faster typing speeds and interrupt capability. This alternative protocol is discussed in detail in Appendix C.

(2) Speed of answer.

(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Call Blockage

The Wyoming Division of Vocational Rehabilitation's Request for Proposal (RFP) which is incorporated into the contractual agreement with Hamilton Telecommunications requires that: "The Contractor shall include adequate staffing to provide Wyoming Relay callers with efficient access under projected calling volumes so that the probability of a busy response due to relay operator unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network. The average daily blockage rate for all calls to each of the Wyoming Relay access telephone numbers shall be no greater than P.01 (one call out of 100). The blockage rate will be measured by sampling the number of calls being blocked at a minimum of every thirty (30) minutes for each 24-hour period. If a call rings or is in queue/hold in excess of ninety (90) seconds, it is to be considered a blocked call. Liquidated damages may be assessed for any day that blockage standards are not met. This information shall be reported monthly to the Agency". Wyoming Relay Service exceeds the FCC's performance standard for blockage.

There has been no blockage at our switch points because our incoming network capacity is well in excess of any peak load requirements. Relay users never receive a busy signal from WYRS. If a relay user does reach a busy signal, there is a problem somewhere else in the network that is not under WYRS' control (i.e. local network, long distance network, equipment, etc.) Although very unlikely, in the event the switch used by WYRS is down, calls are automatically rerouted or intercept messages are used rather than busy signals.

The systems used by WYRS are designed to prevent blockage. The switch used by WYRS is a high-speed, stand-alone, non-blocking digital switching matrix. The system is fully redundant to insure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure WYRS has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by WYRS - from the point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages. This allows WYRS to maintain its zero percent blockage rate.

Hamilton Telecommunications records and reports its answer performance and blockage rate information for the State of Wyoming to the Division of Vocational Rehabilitation and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

Hamilton's transmission circuits meet or exceed industry interexchange performance standards for circuit loss and noise. Hamilton has no busies at its center because of a lack of facilities. Hamilton's system is currently provisioned in such a manner that call blockage or busies never happen. This meets the FCC requirements. Call blockage data is included in Appendix F.

Speed of Answer

The Wyoming Division of Vocational Rehabilitation's Request for Proposal (RFP) which is incorporated into the contractual agreement with Hamilton Telecommunications requires that: "Ninety percent (90%) of all calls, except during network failure, shall be answered within ten (10) seconds on a daily basis by any method which results in the caller's call immediately being placed, not put in queue or on hold. Additionally, the average speed of answer shall be at or less than 3.3 seconds, measured on a daily basis. Abandoned calls shall be included in the speed-of-answer calculation. Average speed of answer shall be measured on a daily basis. Liquidated damages may be assessed for any day that answer time standards are not met". The RFP also requires: "Measurement of ASA shall begin when the Contractor's switch (ACD-Automatic Call Distribution) accepts the call from the local exchange carrier (LEC) and the public switched network delivers the call to the Relay Center. The Relay Center shall accept all calls immediately when offered by the LEC (without delay) or return of a busy signal. Measurement of speed of answer shall continue until the accepted call is either abandoned or answered by a live operator ready to relay the call. This does not include the call being put in queue or on hold or being answered for any other reason except the immediate initiation of the actual outbound call out-dial and relaying of the call. An acknowledgement that the customer is waiting on the line shall not constitute an answer. ASA must be measured by an average of actual answer times calculated as the sum of all individual call answer times divided by the number of inbound calls, not by periodic sampling, nor by an average of averages. Any call not answered within ninety (90) seconds will be considered a blocked call and reported accordingly". **WYRS exceeds the FCC standard of 85% of all calls answered within 10 seconds.**

Wyoming Relay Service recognizes that for relay callers to experience little or no wait time for a Communications Assistant to answer their call is an important indicator of quality of relay service. Since the last recertification Wyoming Relay Service has averaged 97% of calls answered in 10 seconds and Average Answer Times of 1.27 seconds. These Answer Performance measurements are some of the best in the nation. Actual Speed of Answer data is provided in Appendix F.

(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

WYRS provides relay users with access to the interexchange carrier of their choice through the TRS, and to all other operator services, to the same extent that such access is provided to voice users. Interlata and intralata long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each interlata and intralata call, WYRS forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. WYRS has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they

can receive WYRS relay traffic. WYRS offers equal access to all carriers who choose to participate.

When a call has been defined as a long distance call, WYRS sends this call to its relay switching tandem. The correct carrier code is sent with each call so that the tandem sends the call to the customer's carrier. Each call is identified as a relay call. If a relay user has signed up with his/her carrier of choice for a "relay" discount, the carrier will bill the call as a relay call and pass on any discounts. Relay users will receive one bill from their carrier of choice just like they do for all of their direct calls. WYRS explains this type of billing arrangement through all Outreach and Customer Service activities, in newsletters, relay materials, etc. so that relay users understand how to select a carrier and find the best long distance rates.

WYRS provides relay users with access to all other Operator Services to the same extent that such access is provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by WYRS is based on the relay users' ANI that provides automatic connection to the carrier of choice for both interlata and intralata calls made by the relay user. Relay users complete a customer profile with their carrier information and WYRS adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the Communication Assistant of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the Communication Assistant is able to do so. The Communication Assistant will also explain carrier of choice to a relay user when asked.

WYRS offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay. In addition to 1010 dial-around, WYRS has 25 interexchange carriers available on its platform.

In order to obtain new carriers on its platform, WYRS contacts all carriers that are requested by Wyoming relay users to see if they will participate in relay equal access. WYRS then works diligently through ordering and testing phases with that carrier to ensure that the carrier becomes available to Wyoming relay users. Hamilton maintains a list of participating long distance carriers for the Wyoming Relay Service and makes this information available to relay users.

(4) TRS facilities.

(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

The Wyoming Relay Service provides telecommunications relay service 24 hours a day, 7 days a week, 365 days a year. The Wyoming Relay also provides CapTel™, a service that is not mandated by the Federal Communications Commission, 24 hours a day, 7 days a week, 365 days a year.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The facility used by WYRS has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. WYRS is operated from an in-state center located in Aurora, Nebraska. WYRS calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the WYRS relay provider. This ensures continuous operation of the WYRS.

Switching System

WYRS makes use of an Excel telecommunications switch. The GS-2000 is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The GS-2000 supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital Signal Processing service cards and SS7 packet engine cards. The GS-2000 adapts to all standard network and line interfaces, including T1, E1, J1, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms.

The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records. The ISOS is a fully operational basic switch and has great flexibility.

The workstation application was developed to take advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing.

The switching system used by WYRS contains a fully redundant central processing unit on hot standby with automatic failover. This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. WYRS maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The switch used by WYRS is a high-speed, stand-alone, non-blocking digital switching matrix. The system is fully redundant to ensure quality, reliable performance. The system utilizes a

standard T1 interface that enables it to be linked to other digital switches. All cards and power supplies within the system are redundant which gives us the flexibility to switch from one side of the switch to the other to perform updates or to troubleshoot without interrupting call processing. The system is set up to automatically access the secondary operating system on the switch with no human intervention. The system auto-detects any problems and moves to the secondary system immediately if necessary.

The on-sight switching system spare equipment includes:

- D4 channel bank
- All required channel bank cards
- T1 CSU packs
- Switch T-1 card
- Switch conference card

If one of the switching systems used by WYRS cannot be returned to service by transferring control to redundant equipment, the calls automatically will overflow to another switching system. Switching systems used by WYRS are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, is used to control and monitor each of the switching systems. **The control systems provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online.** Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to ensure the required levels of service are always met.

Backup Power

The backup power supply system fully complies with and exceeds the requirements for uninterruptible power. An uninterruptible power source with full battery backup is available to operate the WYRS at full capacity for extended periods of time. **WYRS also has automatically activated generator back-up capabilities allowing it to provide relay service for days and weeks at a time during power outages.**

This power system supports the switch system and its peripherals, switch room and CA work site emergency lights and system alarms, CA consoles/terminals, Call Detail Recording, Supervisory and traffic monitoring consoles, Customer Service and administrative phone and voice mail systems, and building security systems.

WYRS' relay provider maintains auxiliary power sources for nine central offices in addition to all its relay centers. All of Hamilton's back-up power systems are comparable to central office auxiliary power sources in terms of time and capacity. Please see Appendix E for Hamilton's Disaster Recovery Plan.

(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Using flexible software and hardware (i.e. common equipment frames, standard T1 interfaces, windows NT servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by WYRS is ideal for today's rapidly changing technologically advanced environment. WYRS' relay provider can quickly add new features and make changes based on the input from relay users and from our internal evaluations. WYRS' relay provider takes advantage of innovations and technological improvements to enhance the State of Wyoming's relay service.

As a telecommunications company, WYRS' relay provider is on the leading edge of new technology. Hamilton is an Internet provider, cable television provider, computer supplier and a general telecommunications provider. There are new advances in these areas every day. Hamilton is constantly watching for opportunities to use the technological advances in these areas in relay. Hamilton keeps the Wyoming Division of Vocational Rehabilitation informed about any new types of technology that become available.

WYRS relies on user feedback a great deal to set its technological development priorities. WYRS is also involved in several industry groups to stay abreast of the latest FCC activities, user needs, and developing technology.

Signaling System Seven (SS7)

The relay platform used by WYRS has made use of SS7 signaling since February 2002. In compliance with the Calling Party Telephone Number rules set forth at 47 CFR 64.1600, the calling party number is the field that the provider of Wyoming Relay uses to display Caller ID through the Relay. The Relay platforms have been retrofitted to deliver Caller ID in the same manner that these services are delivered today in the public switched network (i.e. WYRS provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box).

Please see Tab 6 for listing of the current technology provided by Hamilton that exceeds the above minimum standards.

(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

True Caller ID

Through the use of SS7 signaling WYRS provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's

Caller ID box. WYRS provides this information on all call types and on all carriers. WYRS brings true functional equivalence to Wyoming Caller ID relay users.

WYRS receives and passes calling line identification information, including blocking information from all users calling through the relay service. If the Caller ID block indicator is enabled on the call when WYRS receives it, the relay caller's number is not passed on to the called party. The call blocking information passes through automatically to the called party with no relay intervention. The relay user has complete control over blocking information with their local phone company. Please see Appendix C for more information.